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Attorneys for Plaintiff MICHELLE T.
WAHL on behalf of herself and all others
similarly situated.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MICHELLE T. WAHL, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

AMERICAN SECURITY INSURANCE
COMPANY; and DOES 1-50, inclusive,

Defendant.

Case No. C08-00555-RS

CLASS ACTION

**JOINT PROPOSED PRE-TRIAL
SCHEDULE**

At the Case Management Conference held by the Court on January 20, 2011, the Court directed the parties to submit a Joint Proposed Pre-Trial Schedule. The Court further directed that the proposed schedule should include deadlines having all discovery completed in September 2011, all dispositive motion by either party filed in October 2011, a final pre-trial conference in January 2012, and a trial commencement date in February 2012.

The parties, by their undersigned counsel hereby jointly propose the following pre-trial schedule consistent with the Court's directives:

Event	Proposed Deadline
Distribution of Class Notice	March 21, 2011
Expert Witness Reports Served	July 29, 2011
Expert Witness Rebuttal Reports (if any) Served	September 2, 2011
Completion of Hearings for All Discovery Motions, and Completion of All Fact and Expert Discovery	September 30, 2011
Dispositive Motions	On or before October 6, 2011
Dispositive Oppositions	October 27, 2011
Dispositive Replies	November 3, 2011
Hearing on Post-Discovery Dispositive Motions	December 1, 2011
Joint Final Pretrial Conference Statement (including witness and exhibit lists and deposition designations)	January 12, 2012
Motions <i>in limine</i> and other objections to witness and exhibit lists and deposition designations	January 26, 2012

Event	Proposed Deadline
Trial Briefs	January 26, 2012
Final pretrial conference	February 2, 2012
Bench Trial	Commencing February 13, 2012

Dated: January 26, 2011

By: s/Stephen F. Yunker

By: s/ Frank Burt

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Dated: 1/27/2011

